

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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CHARLES ISELEY,

Plaintiff

v.

W. CONWAY BUSHEY, et al.,

Defendants

No. 1:00-CV-00577
(Judge Kane)

FILED
HARRISBURG, PA

NOV 27 2000

**DEFENDANTS' MOTION TO EXTEND
DEADLINE TO COMPLETE DISCOVERY**

MARY E. D'ANDREA, CLERK
Per [Signature]
Deputy Clerk

Defendants, by their counsel, hereby request the Court to extend the deadline for the completion of discovery in this case for a period of two months until January 30, 2001. In support of this motion, defendants state as follows:

1. This action was transferred to Middle District of Pennsylvania on February 23, 2000.
2. On May 30, 2000, defendants filed an answer to the complaint.
3. Discovery in this case closes on November 30, 2000 and all dispositive motions are to be filed on or before January 2, 2001.
4. The parties have engaged in discovery.
5. Defendants have determined a disposition of plaintiff is necessary. Therefore, defendants filed a motion for leave to take plaintiff's deposition as required by Fed.R.Civ.P. 30(a)(2). The motion and supporting brief were filed on October 31, 2000.
6. Defendants on November 15, 2000, filed a motion with the Court to extend the deadline for filing dispositive motions until March 2, 2001. Defendants inadvertently omitted the request to extend the discovery date as well.

7. On November 23, 2000, plaintiff filed a Motion for Enlargement of Time to Complete Discovery.


8. No prejudice will befall any party by this extension of limited duration as proposed herein.

WHEREFORE, defendants respectfully request the Court to grant an extension of time to complete discovery until January 30, 2001.

Respectfully submitted,

D. MICHAEL FISHER
Attorney General

By:


MARYANNE M. LEWIS
Deputy Attorney General

SUSAN J. FORNEY
Chief Deputy Attorney General
Chief Litigation Section

Office of Attorney General
15th Floor, Strawberry Sq.
Harrisburg, PA 17120
Direct Dial: (717) 787-1194
Fax: (717) 772-4526

DATE: November 27, 2000

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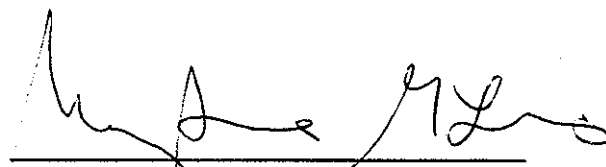
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No. 1:00-CV-00577
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CERTIFICATE OF SERVICE

I, Maryanne M. Lewis, Deputy Attorney General, hereby certify that on this date
I caused to be served the foregoing Defendants' Motion to Extend Deadline to Complete
Discovery, by depositing a copy of the same in the United States mail, postage prepaid, in
Harrisburg, PA., addressed to the following:

Charles Iseley, #AM-9320
SCI-Coal Township
1 Kelley Dr.
Coal Township, PA 17866



MARYANNE M. LEWIS
DEPUTY ATTORNEY GENERAL

DATE: November 27, 2000